

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

THOMPSON PRODUCTS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 05-11810-RGS
	)	
GLENN THOMPSON, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

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**ANSWER TO COUNTERCLAIM**

Plaintiff, Thompson Products, Inc. ("TPI"), by counsel, for its Answer to the Counterclaim filed herein by Defendants, Glenn Thompson and Thompson Enterprises, Inc., now known as Splash Creations, Inc. (collectively referred to herein as "Defendants"), says as follows:

**FIRST DEFENSE**

Neither the Counterclaim as a whole nor any of the counts therein state a claim for relief against TPI.

**SECOND DEFENSE**

Robert Jackson is not a servant or employee of TPI for whose acts TPI is vicariously liable.

**THIRD DEFENSE**

The alleged defamatory statements are true.

**FOURTH DEFENSE**

The alleged defamatory statements are opinions and not actionable.

FIFTH DEFENSE

The alleged defamatory statements are privileged and not actionable.

SIXTH DEFENSE

Defendants have not been injured in the manner or to the extent alleged in the Counterclaim.

SEVENTH DEFENSE

As for the specific allegations contained in the Counterclaim, TPI says as follows:

1. TPI is without sufficient information to admit or deny the allegation contained in the first sentence of paragraph 1. TPI admits the allegation contained in the second sentence of paragraph 1.
2. TPI is without sufficient information to admit or deny the allegations contained in paragraph 2.
3. TPI admits the allegations contained in paragraph 3.
4. As to the allegations contained in paragraph 4, TPI denies those in the first sentence and admits those in the second sentence.
5. TPI denies the allegations contained in paragraph 5.
6. TPI denies the allegations contained in paragraph 6.
7. TPI is without sufficient information to admit or deny the allegations contained in paragraph 7.
8. TPI denies the allegations contained in paragraph 8.
9. In response to the allegations contained in paragraph 9, TPI incorporates here paragraphs 1 through 8 above.
10. TPI denies the allegations contained in paragraph 10.

11. TPI denies the allegations contained in paragraph 11.
12. TPI denies the allegations contained in paragraph 12.
13. In response to the allegations contained in paragraph 13, TPI incorporates here paragraphs 1 through 8 above.
14. TPI denies the allegations contained in paragraph 14.
15. TPI denies the allegations contained in paragraph 15.
16. TPI denies the allegations contained in paragraph 16.
17. In response to the allegations contained in paragraph 17, TPI incorporates by reference paragraphs 1 through 8 above.
18. TPI denies the allegations contained in paragraph 18.
19. TPI denies the allegations contained in paragraph 19.
20. TPI denies that Defendants are entitled to any of the relief requested in paragraphs (a) through (d).
21. TPI denies any allegations contained in the Counterclaim not specifically admitted herein.

**THOMPSON PRODUCTS, INC.**

By its attorneys,

/s/ Andrew D. Kang

Terence P. McCourt (BBO #555784)  
Andrew D. Kang (BBO #637476)  
GREENBERG TRAURIG, LLP  
One International Place  
Boston, MA 02110  
Tel: 617.310.6000  
Fax: 617.310.6001

and

Sandy T. Tucker  
*Admitted Pro Hac Vice*  
Monica McCarroll  
*Admitted Pro Hac Vice*  
WILLIAMS MULLEN, A PROFESSIONAL CORPORATION  
1021 East Cary Street (23219)  
Post Office Box 1320  
Richmond, VA 23218-1320  
Tel: 804.783.6418  
Fax: 804.783.6507

DATED: March 7, 2006

**CERTIFICATE OF SERVICE**

I, Andrew D. Kang, hereby certify that on the 7th day of March, 2006, I served the foregoing by U.S. Mail, to the following counsel of record:

Matthew F. Medeiros, Esq.  
LITTLE MEDEIROS KINDER BULMAN & WHITNEY, P.C.  
72 Pine Street  
Providence, RI 02903

Michael S. Chinitz, Esq.  
Lisa A. Tenerowicz, Esq.  
ROSE & ASSOCIATES  
29 Commonwealth Avenue  
Boston, MA 02116

/s/ Andrew D. Kang

Andrew D. Kang

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